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Center of Southern Nevada Pro Bono Project*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JUSTIN L. TRIPP,  
Plaintiff,  
vs.  
CLARK COUNTY, et al  
Defendants.

CASE NO: 2:17-cv-01964-JCM-BNW

**AMENDED STIPULATION AND  
ORDER TO EXTEND TIME FOR  
PLAINTIFF TO RESPOND TO  
DEFENDANTS' MOTIONS FOR  
SUMMARY JUDGMENT  
(Fifth Request)**

COMES NOW, Plaintiff Justin Tripp (“Plaintiff”), by and through his counsel, the law firm of Hatfield & Associates., Ltd., appearing *pro bono publico*, and Defendant Cesar Esparza, Defendant Las Vegas Metropolitan Police Department, Defendants Michael Rose and Jacqulyn Schumaker and Defendants LVMPD Sergeants’ (hereinafter “LVMPD Defendants”) by and through their counsel, the law firm of Kaempfer Crowell, and Defendant NaphCare, Inc., Defendant Harry Duran, M.D., Defendant Eric Lopez, P.A., Defendant Rachel Scheiblich, Defendant Kendra Meyer, and Defendant Raymond Mondora, (hereinafter “NaphCare Defendants”), by and through their counsel, the law firm of Lauria Tokunaga Gates & Linn, LLP, and hereby stipulate and agree to extend the time for Plaintiff to Respond to the following Defendants’ Motions for Summary Judgment, due on February 11, 2022, to March 14, 2022:

1. Defendant Cesar Esparza's Motion for Summary Judgment [ECF #198];

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- 1        2. Defendant Las Vegas Metropolitan Police Department's Motion for Summary Judgment
- 2                  [ECF #199];
- 3        3. Defendants Michael Rose's and Jacqulyn Schumaker's Motion for Summary Judgment
- 4                  [ECF #200];
- 5        4. Defendants' LVMPD Sergeants' Motion for Summary Judgment [ECF #201].
- 6        5. NaphCare Defendants' Motion for Summary Judgment [ECF #197].

8                  This request is submitted pursuant to LR IA 6-1, 6-2 and 7-1 and is the parties' fifth  
9                  request for an extension of time for Plaintiff to respond to Defendants' Motions for Summary  
10                 Judgment.

11                 Good cause exists for this extension. Plaintiff's counsel is requesting a thirty (30) day  
12                 extension of time up to and including March 14, 2022 (as the thirtieth day is a Sunday), to  
13                 respond to all parties' Motions for Summary Judgment as Plaintiff is incarcerated,  
14                 communication must be scheduled, and the volume of the motions. Plaintiff was not permitted  
15                 to take his legal documents with him in transit. Therefore, Plaintiff's counsel had to mail his  
16                 legal documents to his new prison location. In addition, Plaintiff's counsel's staff was absent for  
17                 nearly one month's time due to contracting Covid-19 and has only recently been back to work.  
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20                 Defendants have courteously granted this extension of time for Plaintiff to file his  
21                 Responses. Accordingly, Plaintiff shall have up to and including March 14, 2022, to respond

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1 to Defendants' Motions for Summary Judgment [ECF #197], [ECF #198], [ECF  
2 #199], [ECF #200] and [ECF #201].

3 DATED this 11<sup>th</sup> day of February, 2022

4 **HATFIELD & ASSOCIATES**

5 By: /s/ Trevor J. Hatfield  
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Attorney for Plaintiff In Conjunction with  
Legal Aid Center of Southern Nevada Pro  
Bono Project.

DATED this 11<sup>th</sup> day of February, 2022

KAEMPFER CROWELL

By: /s/ Lyssa S. Anderson  
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Attorneys for Defendants Cesar Esparza,  
Michael Rose, Jacqulyn Schumaker,  
LVMPD Sergeants.

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11  
12 DATED this 11<sup>th</sup> day of February, 2022

13 **LAURIA TOKUNAGA GATES & LINN, LLP**

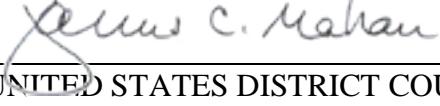
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22 Attorneys for NAPHCARE, INC., an Alabama Corporation; HARRY DURAN, M.D., in his  
individual capacity; ERIC LOPEZ, P.A., in his individual capacity; RACHEL SCHEIBLICH  
(formerly known as "RUDD") in her individual capacity; KENDRA MEYER (formerly known as  
SCHULTZ") in her individual capacity, and RAYMOND MONDORA

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25 **ORDER**

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27 **IT IS SO ORDERED:**

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UNITED STATES DISTRICT COURT JUDGE  
Dated: February 14, 2022